

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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SENTINEL INSURANCE COMPANY, LTD.,

Civil Action No. 19-cv-20142-RMB-AMD

Plaintiff,

-vs-

CONRAD J. BENEDETTO, individually and doing  
business as THE LAW OFFICES OF CONRAD J.  
BENEDETTO, and JOHN GROFF,

**DECLARATION OF  
LAIANNA C. HARTLEY**

Defendants.

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CONRAD J. BENEDETTO, THE LAW  
OFFICES OF CONRAD J. BENEDETTO, and  
JOHN GROFF,

Plaintiffs,

-vs-

SENTINEL INSURANCE COMPANY, LTD.,  
JOHN DOES and ABC ENTITIES A-Z,

Defendants.

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LAIANNA C. HARTLEY, pursuant to 28 U.S.C. § 1746, declares the following:

1. I am a Senior Claims Representative in the Strategic Claim Management unit of The Hartford and am currently responsible for handling the insurance coverage claim at issue in this action on behalf of Plaintiff Sentinel Insurance Company, Ltd. (“Sentinel”). I submit this declaration in opposition to the motion for partial summary judgment of Conrad J. Benedetto and The Law Offices of Conrad J. Benedetto (collectively, the “Defendants”). I have personal knowledge of the matters set forth herein, and if called upon to do so, I could and would so competently testify as to those matters.

2. This action relates to Defendants' claim for insurance coverage from Sentinel with respect to two underlying lawsuits pending in the Superior Court of the State of New Jersey, captioned *Brian Nunez v. The Law Offices of Conrad J. Benedetto, et al.*, Case No. CAM-L-003997-18 (N.J. Super. Ct., Camden Co.) (“Nunez Action”), and *John Doe v. The Law Offices of Conrad J. Benedetto, et al.*, Case No. CAM-L-004588-18 (N.J. Super. Ct., Camden Co.) (“Nava Action”) (collectively, the “Underlying Actions”).<sup>1</sup>

3. A true and correct copy of Sentinel’s primary general liability policy 38 SBA BX9035 issued to Conrad Benedetto dba The Law Offices of Conrad J. Benedetto for the period October 12, 2015 to October 12, 2016 is attached hereto as Exhibit A.

4. A true and correct copy of Sentinel’s primary general liability policy 38 SBA BX9035 issued to Conrad Benedetto dba The Law Offices of Conrad J. Benedetto for the period October 12, 2016 to October 12, 2017 is attached hereto as Exhibit B.

5. A true and correct copy of Sentinel’s primary general liability policy 38 SBA BX9035 issued to Conrad Benedetto dba The Law Offices of Conrad J. Benedetto for the period October 12, 2017 to October 12, 2018 is attached hereto as Exhibit C.

6. A true and correct copy of Sentinel’s primary general liability policy 38 SBA BX9035 issued to Conrad Benedetto dba The Law Offices of Conrad J. Benedetto for the period October 12, 2018 to October 12, 2019 is attached hereto as Exhibit D.

7. A true and correct copy of Sentinel’s primary general liability policy 38 SBA BX9035 issued to Conrad Benedetto dba The Law Offices of Conrad J. Benedetto for the period October 12, 2019 to October 12, 2020 is attached hereto as Exhibit E.

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<sup>1</sup> The Underlying Action brought by Javier Nava was originally filed anonymously by him as “John Doe.”

8. A true and correct copy of the complaint in the Nunez Action that was tendered by Defendants to Sentinel is attached hereto as Exhibit F.

9. A true and correct copy of the complaint in the Nava Action that was tendered by Defendants to Sentinel is attached hereto as Exhibit G.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 24, 2020.

Laianna C. Hartley  
LAIANNA C. HARTLEY